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8 Attorneys for Defendant Shannon Blaylock

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 -000-

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 SHANNON BLAYLOCK, et al.,

17 Defendant

) No. CR 07-0454 PJH
)

) **EX PARTE APPLICATION TO PERMIT**
) **LATE FILING OF DEFENDANT'S**
) **OPPOSITION TO GOVERNMENT'S**
) **OMNIBUS MOTION IN LIMINE;**
) **DECLARATION OF COUNSEL; PROPOSED**
) **ORDER**

18 _____/
19 Defendant Shannon Blaylock, by and through his counsel of record Randy Sue Pollock, hereby
20 applies for an Order permitting the late filing of the defense opposition to the government's omnibus
21 motion in limine. This application is based on this application, the accompanying declaration of counsel,
22 and the files and record in this case.

23
24 Date: August 21, 2008

Respectfully submitted,

25
26 /s/ Randy Sue Pollock
Randy Sue Pollock
27
28

DECLARATION OF COUNSEL

I, Randy Sue Pollock, declare and state as follows:

1. I am co-counsel for defendant Shannon Blaylock in CR. 07-00454-PJH;
2. On August 13, 2008, the governments filed their pretrial motions and counsel did receive their Omnibus Motion In Limine as well as the Motion In Limine that was filed *under seal*;
3. Unfortunately due to counsel's oversight, the opposition to the government's Omnibus Motion in Limine was inadvertently not filed yesterday as required;
4. The government has no objection to this late filing.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge.
Executed this 21st day of August, 2008 in Oakland, CA.

/s/ Randy Sue Pollock
RANDY SUE POLLOCK

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Attorneys for Defendant Shannon Blaylock

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

—000—

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SHANNON BLAYLOCK, et al.,

Defendant

No. CR 07-0454 PJH

**[PROPOSED] ORDER TO PERMIT LATE
FILING OF DEFENDANT'S OPPOSITION TO
GOVERNMENT'S OMNIBUS MOTION IN
LIMINE; DECLARATION OF COUNSEL**

GOOD CAUSE SHOWN, based on the application and declaration of counsel for defendant SHANNON BLAYLOCK, IT IS HEREBY ORDERED that defendant's application for a one day extension until August 21, 2008, to file their opposition to the government's omnibus motion in limine is GRANTED/DENIED.

Date:

PHYLLIS J. HAMILTON
U.S. DISTRICT COURT JUDGE